

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	Lead Bankr. Case No. 15-11089-TPA
JEFFREY MARTIN FELDMILLER and SANDRA LEE FELDMILLER	Chapter 13
Debtors.	
RONDA J. WINNECOUR, CHAPTER 13 TRUSTEE	Movant
v.	
NEWREZ, LLC D/B/A SHELLPOINT MORTGAGE SERVICING,	
Respondent	

**STIPULATION REGARDING ORDER TO SHOW CAUSE**

It is stipulated by and between the Debtors, Jeffrey Martin Feldmiller and Sandra Lee Feldmiller (hereinafter “Debtors”), by and through their counsel, Michael Jan Janin, Esquire, Ronda J. Winnecour, Esquire, Chapter 13 Trustee (“Trustee”) and Respondent, NewRez, LLC d/b/a Shellpoint Mortgage Servicing (hereinafter “NewRez”), by and its counsel, Keri P. Ebeck, Esquire together file this Stipulation Regarding Order to Show Cause and state as follows:

1. The Trustee filed her Notice of Final Cure on October 12, 2020 at Doc. No. 74.
2. NewRez filed its Response to the Notice of Final Cure on October 27, 2020 at Doc. No. 77 disagreeing with the post-petition status.
3. Trustee filed her Motion to Determine of Final Cure on October 29, 2020 at Doc. No. 78.
4. A Status Conference was scheduled for December 9, 2020 before this Honorable Court.

5. For failure to appear at the status conference, along with the other pending matters, an Order to Show Cause was issued against NewRez on December 14, 2020 at Doc. No. 89.
6. On December 15, 2020, this Honorable Court issued an Order granting Trustee's Motion for Determination of Final Cure at Doc No. 90, deeming the mortgage current through October 2020.
7. The parties have conferred and have reached an agreement as set forth below terms:
  - a. Within fourteen (14) days of approval of this Stipulation, NewRez shall pay \$500 for legal fees and costs accrued by the Debtors in defending this matter to the Quinn Law Firm and \$500 to the Debtors, Jeffrey Martin Feldmiller and Sandra Lee Feldmiller for a total of \$1000.00.
  - b. The checks shall be made payable to "Quinn Law Firm" and "Jeffrey Martin Feldmiller and Sandra Lee Feldmiller" respectively and sent directly to Michael Jan Janin, Esquire at 2222 West Grandview Blvd, Erie, PA 16506
  - c. In accordance with the Court's Order at Doc. No. 90, NewRez shall bring the mortgage loan of the Debtors for the property of 11755 Carter Road, Albion, PA 16401 ("Mortgage") current through October 2020 and apply any payments received from October 2020 to the loan as contractual due.
  - d. NewRez shall provide a payment history to Debtors and their counsel as well as the Trustee via mail and email to provide an updated accounting and corrected payment history within fourteen (14) days of this Stipulation being approved.

- e. NewRez shall correct any credit reporting with all three (3) credit reporting agencies regarding activity from June 2020 through December 2020 in accordance with Stipulation.
- 8. This Stipulation shall not be construed as any admission on behalf of NewRez of any alleged violation of the discharge injunction, contempt of court and/or RESPA.
- 9. NewRez understands that this may not resolve the pending Order to Show Cause issued by the Court, therefore, NewRez will be filing a separate response to the Order to Show Cause directly providing information and responding to all of the Court's concerns raised. NewRez also understands that a hearing may still be required after such.
- 10. This Stipulation may only be modified by a revised Stipulation filed on the docket. No oral modifications are permitted and any allegation that the Stipulation was modified orally will be disregarded as evidence. No written modifications are permitted, except for a revised Stipulation filed on the docket;
- 11. The Parties respectfully request that this Honorable Court enter an order granting the Stipulation.

**Stipulated and Agreed by:**

BERNSTEIN-BURKLEY, P.C.

By: /s/ Keri P. Ebeck  
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*Attorney for Respondent NewRez, LLC d/b/a Shellpoint  
Mortgage Servicing*

**Stipulated and Agreed by:**

By: /s/ Michael Jan Janin  
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*Attorney for Debtors*

**Stipulated and Agreed by:**

By: /s/ Ronda J. Winnecour  
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